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Attorneys for Defendant
IMRAN HUSAIN

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

IMRAN HUSAIN,

Defendant.

Case No.: CR 14-149-RS

STIPULATION TO CONTINUE
STATUS CONFERENCE
REGARDING EXCLUDABLE TIME
PERIODS UNDER SPEEDY TRIAL
ACT; ~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED by and between defendant, Imran Husain,
by and through his counsel of record, Victor Sherman, and plaintiff, United States
of America, by and through its counsel of record, Benjamin Kingsley, hereby
stipulate as follows:

1. By previous order, this matter was set for status on September 16,
2014 at 2:30 p.m.

- 1 2. By this Stipulation, the parties now move to continue the status
2 conference until September 30, 2014 at 2:30 p.m. and to exclude time
3 between September 16, 2014 and September 30, 2014, under 18
4 U.S.C. §3161(h)(7)(A); B(iv).
- 5 3. The parties agree and stipulate and request that the Court find the
6 following:
 - 7 a. The government has represented that the initial discovery has
8 been provided and is continuing to prepare additional discovery
9 in this matter. Discovery is ongoing at this time, but is not
10 complete.
 - 11 b. Counsel for the defendant needs additional time for
12 investigation and preparation. Counsel for defendant is
13 continuing to investigate the matter. Counsel for defendant
14 believes that failure to grant the above-requested continuance
15 would deny them the reasonable time necessary for effective
16 preparation and resolution, taking into account the exercise of
17 due diligence.
 - 18 c. The government does not object to the continuance and agrees
19 a continuance is necessary due to the ongoing voluminous
20 discovery review.
 - 21 d. Based on the above-stated findings, the ends of justice served
22 by continuing the case as requested outweigh the interest of the
23 public and the defendant in a trial within the original date
24 prescribed by the Speedy Trial Act.
 - 25 e. For the purpose of computing time under the Speedy Trial Act,
26 18 U.S.C. §3161, et seq., within which trial must commence,
27 the time period of September 16, 2014 to September 30, 2014,
28

1 inclusive, is deemed excludable pursuant to 18 U.S.C.
2 §316(h)(7)(A), B(iv) because it results from a continuance
3 granted by the Court at defendant's request on the basis of the
4 Court's findings that the ends of justice served by taking such
5 action outweigh the best interest of the public and the
6 defendant's interest in a speedy trial.

- 7 4. Nothing in this Stipulation and Order shall preclude a finding that
8 other provisions of the Speedy Trial Act dictate that additional time
9 periods are excludable from the period within which a trial must
10 commence.

11 IT IS SO STIPULATED.

12 DATED: September 15, 2014

Respectfully submitted,

13 SHERMAN & SHERMAN
14 A Professional Law Corporation

15 /s/Victor Sherman

16 By:

VICTOR SHERMAN
Attorney for Defendant
Imran Husain

18 /s/Benjamin Kingsley

19 DATED: September 15, 2014

By:

20 BENJAMIN KINGSLEY
21 Assistant United States Attorney

22 ~~(PROPOSED)~~ ORDER

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 DATED: September 16, 2014

25 
26 HON. RICHARD SEEBORG
United States District Judge